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Lafayette, Louisiana
May 3, 2004

Hon. James H. Welsh
Commissioner of Conservation
Office of Conservation
Post Office Box 94275
Baton Rouge, Louisiana 70804-4275

Re: 19,100' Tuscaloosa Sand, Reservoir A
Profit Island Field
Pointe Coupee Parish, Louisiana

Dear Commissioner Welsh:

Application is hereby made on behalf of **BP AMERICA PRODUCTION COMPANY** for the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the 19,100' Tuscaloosa Sand, Reservoir A, in the Profit Island Field, Pointe Coupee Parish, Louisiana, for which rules and regulations were established and drilling and production units were created for the exploration for and production of gas and condensate by the 1075-A Series of Office of Conservation Orders, including the unit designated 19100 TUSC RA SUU:

1. To redefine the 19,100' Tuscaloosa Sand, Reservoir A, insofar as the 19100 TUSC RA SUU is concerned, as being that gas and condensate bearing sand encountered between the depths of 18,330 feet and 20,500 feet on the Schlumberger DIL – Sonic Log of the Chevron U.S.A. Inc. – Hurst-Ricard No. 1 Well, located in Section 49, Township 5 South, Range 11 East, Pointe Coupee Parish, Louisiana.
2. To designate BP America Production Company as operator of the 19100 TUSC RA SUU.

3. To permit the applicant to drill, designate and utilize its Rougon No. 3 Well as substitute unit well for the 19100 TUSC RA SUU, said well located approximately as shown on the plat attached hereto, in exception to the spacing provisions of Office of Conservation Order No. 1075, effective September 18, 1979. BP further requests a tolerance of no closer than 330 feet from the nearest unit line for the proposed substitute unit well to account for the possible variance between the proposed location and the "as drilled" location.
4. To find that the proposed substitute unit well is necessary to efficiently and economically drain a portion of the reservoir covered by the unit which cannot be so drained by any existing well within such unit.
5. Except to the extent contrary herewith, to continue in full force and effect the provisions of 1075-A Series of Office of Conservation Orders, the units created thereby, and applicable Statewide Orders.
6. To consider such other matters as may be pertinent.

The 19,100' Tuscaloosa Sand, Reservoir A, in the Profit Island Field, Pointe Coupee, East Baton Rouge and West Baton Rouge Parishes, Louisiana, was defined in Office of Conservation Order No. 1075, effective September 18, 1979, redefined in Office of Conservation Order No. 1075-A-6, effective October 3, 1995, and is hereby redefined, insofar as the 19100 TUSC RA SUU is concerned, in accordance with Item No. 1 above.

The existing unit well, the Hurst – Ricard et al No. 1 Well, went off production and has been plugged. It is the applicant's opinion that the proposed substitute unit well is necessary to efficiently and economically drain that portion of the reservoir covered by subject unit and that such drilling, designation and use will be in the interest of conservation and will cause no harm or injury to others.

Pursuant to the Revised Rules of Procedure, a pre-application conference was held in Lafayette, Louisiana, on May 3, 2004, at which the parties named on the attached list were in attendance. The conference was opened by representatives of the applicant who explained the bases for the applicant's proposal. Questions were asked and answered. No objections were presented and the conference was adjourned.

Attached hereto and made a part hereof is a plat outlining the applicant's proposal, along with the conference attendance list and a list of the names and addresses of the Interested Owners, Represented Parties and Interested Parties to whom a copy of this application is being sent. Pursuant to the Revised Rules of Procedure, the list of parties is being furnished only to the Commissioner of Conservation and to the District Manager of the Lafayette District of the Office of Conservation; however, the list of parties will be provided to any party requesting a copy of it. A reasonable effort was made to ascertain the names and addresses of all Interested Owners, Interested Parties and Represented Parties.

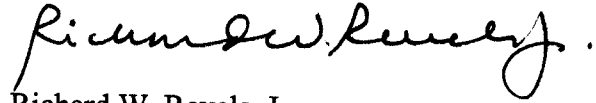
May 3, 2004

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Finally, enclosed is our check on behalf of the applicant, in the amount of \$755.00 made payable to the Office of Conservation and representing the required hearing application fee.

Very truly yours,



Richard W. Revels, Jr.

RWRjr/dbf
Enclosures

cc: Mr. Richard Hudson, Lafayette District Office of Conservation
cc: Interested Owners, Represented Parties and Interested Parties

117972_1.DOC
10455.0129

SU AA

T5S-R11E

RUBY G. LOUP 1

E. PATIN SWD

SU Z

50

J.F. DARENSBOURG ET AL 1

GRID



SU FF

PFI 19100 TUSC RA SU U
ORDER 1075-A

SU T

49

HURST-RICARD ET AL 1

ST

EXISTING
UNIT WELL

BP AMER.
ROUGON

650'

3

PBHL

PROPOSED
SUBSTITUTE
UNIT WELL

J.V. ROUGON
ET AL

Ø 2

48

J.V. ROUGON ET AL 1

SU W

61

SU X

EXHIBIT NO.
DOCKET NO.

DATE:

BP AMERICA PRODUCTION COMPANY

PROFIT ISLAND FIELD
POINTE COUPEE PARISH, LOUISIANA

PROPOSED SUBSTITUTE UNIT WELL
19100' TUSCALOOSA SAND

0 1000' 2000'

GRAPHICS BY: GEOLAND GRAPHICS, LLC LAFAYETTE, LA (337) 233-1887



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